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8 *Attorney for Defendants Tan Holdings Corporation,*
9 *Tan Holdings Overseas Incorporated, and Concorde*
10 *Garment Manufacturing Corporation*

11 **UNITED STATES DISTRICT COURT**

12 **FOR THE**

13 **NORTHERN MARIANA ISLANDS**

14 **EQUAL EMPLOYMENT OPPORTUNITY**
15 **COMMISSION,**

16 **Plaintiff,**

17 **v.**

18 **L&T INTERNATIONAL CORPORATION,**
19 **L&T GROUP OF COMPANIES, LTD., TAN**
20 **HOLDINGS CORPORATION, TAN**
21 **HOLDINGS OVERSEAS INCORPORATED,**
22 **CONCORDE GARMENT MANUFACTURING**
23 **CORPORATION and DOES 1-5 Inclusive.**

24 **Defendants.**

25 **ABELLANOSA, JOANA, ET. AL.**

Plaintiffs-In-Intervention

CASE NO. CV-07-0029

**ANSWER TO COMPLAINT-IN-
INTERVENTION OF PLAINTIFFS-
INTERVENORS**

For its answer to Complaint in Plaintiffs' Interventions, Defendants admit, denies, and alleges as follows:

1 1. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 1 of the Complaint for Intervention.

3 2. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 2 of the Complaint for Intervention.

5 3. Answering Defendants deny each and every allegation or statement contained in
6 paragraph number 3 of the Complaint for Intervention.

7 4. Answering Defendants have insufficient information to form a belief as to the truth of
8 paragraph 4 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
9 allegations and each of them and requires strict proof thereof.

10 5. Answering Defendants have insufficient information to form a belief as to the truth of
11 paragraph 5 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
12 allegations and each of them and requires strict proof thereof.

13 6. Answering Defendants have insufficient information to form a belief as to the truth of
14 paragraph 6 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
15 allegations and each of them and requires strict proof thereof.

16 7. Answering Defendants admit that on September 12, 2007, the EEOC filed a Complaint
17 with this Court against Defendants alleging, inter alia, that Defendants "unlawfully discriminated
18 against then and terminated the employment of the Charging Parties. Except as expressly admitted,
19 Answering Defendant denies each and every allegation and statement in the paragraph 7.

20 8. Answering Defendants deny each and every allegation or statement contained in
21 paragraph number 8 of the Complaint for Intervention.

22 9. Answering Defendants deny each and every allegation or statement contained in
23 paragraph number 9 of the Complaint for Intervention.

1 10. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 10 of the Complaint for Intervention.

3 11. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 11 of the Complaint for Intervention.

5 12. Answering Defendants deny each and every allegation or statement contained in
6 paragraph number 12 of the Complaint for Intervention.

7 13. Answering Defendant admits the allegations contained in paragraph 13 to the extent
8 supported by the statutes cited, otherwise denies the allegations contained in paragraph 13.
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10 14. Answering Defendants deny each and every allegation or statement contained in
11 paragraph number 14 of the Complaint for Intervention.

12 15. Answering Defendants deny each and every allegation or statement contained in
13 paragraph number 15 of the Complaint for Intervention.

14 16. Answering Defendants deny each and every allegation or statement contained in
15 paragraph number 16 of the Complaint for Intervention.

16 17. Answering Defendants admit each and every allegation or statement contained in
17 paragraph number 17 of the Complaint for Intervention.

18 18. Answering Defendants deny each and every allegation or statement contained in
19 paragraph number 18 of the Complaint for Intervention.

20 19. Answering Defendants deny each and every allegation or statement contained in
21 paragraph number 19 of the Complaint for Intervention.

22 20. Answering Defendants deny each and every allegation or statement contained in
23 paragraph number 20 of the Complaint for Intervention.
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1 21. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 21 of the Complaint for Intervention.

3 22. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 22 of the Complaint for Intervention.

5 23. Answering Defendants admit each and every allegation or statement contained in
6 paragraph number 23 of the Complaint for Intervention.

7 24. Answering Defendants deny each and every allegation or statement contained in
8 paragraph number 24 of the Complaint for Intervention.

9 25. Answering Defendants deny each and every allegation or statement contained in
10 paragraph number 25 of the Complaint for Intervention.

11 26. Answering Defendants admit each and every allegation or statement contained in
12 paragraph number 26 of the Complaint for Intervention.

13 27. Answering Defendants have insufficient information to form a belief as to the truth of
14 paragraph 27 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
15 allegations and each of them and requires strict proof thereof.

16 28. Answering Defendants have insufficient information to form a belief as to the truth of
17 paragraph 28 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
18 allegations and each of them and requires strict proof thereof.

19 29. Answering Defendants have insufficient information to form a belief as to the truth of
20 paragraph 29 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
21 allegations and each of them and requires strict proof thereof.

22 30. Answering Defendants deny each and every allegation or statement contained in
23 paragraph number 30 of the Complaint for Intervention.
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1 31. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 31 of the Complaint for Intervention.

3 32. Answering Defendants deny the allegations contained in paragraph number 32 for lack of
4 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

5 33. Answering Defendants deny the allegations contained in paragraph number 33 for lack of
6 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

7 34. Answering Defendants deny each and every allegation or statement contained in
8 paragraph number 34 of the Complaint for Intervention.

9 35. Answering Defendants have insufficient information to form a belief as to the truth of
10 paragraph 35 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
11 allegations and each of them and requires strict proof thereof.

12 36. Answering Defendants have insufficient information to form a belief as to the truth of
13 paragraph 36 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
14 allegations and each of them and requires strict proof thereof.

15 37. Answering Defendants deny each and every allegation or statement contained in
16 paragraph number 37 of the Complaint for Intervention.

17 38. Answering Defendants deny each and every allegation or statement contained in
18 paragraph number 38 of the Complaint for Intervention.

19 39. Answering Defendants deny each and every allegation or statement contained in
20 paragraph number 39 of the Complaint for Intervention.

21 40. Answering Defendants deny the allegations contained in paragraph number 40 for lack of
22 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

1 41. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 41 of the Complaint for Intervention.

3 42. Answering Defendants have insufficient information to form a belief as to the truth of
4 paragraph 42 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
5 allegations and each of them and requires strict proof thereof.

6 43. Answering Defendants deny the allegations contained in paragraph number 43 for lack of
7 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

8 44. Answering Defendants deny the allegations contained in paragraph number 44 for lack of
9 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

10 45. Answering Defendants deny each and every allegation or statement contained in
11 paragraph number 45 of the Complaint for Intervention.

12 46. Answering Defendants deny the allegations contained in paragraph number 46 for lack of
13 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

14 47. Answering Defendants deny the allegations contained in paragraph number 47 for lack of
15 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

16 48. Answering Defendants deny the allegations contained in paragraph number 48 for lack of
17 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

18 49. Answering Defendants deny the allegations contained in paragraph number 49 for lack
19 of information or knowledge sufficient to form a belief as to the truth of the matters asserted.

20 50. Answering Defendants deny the allegations contained in paragraph number 50 for lack
21 of information or knowledge sufficient to form a belief as to the truth of the matters asserted.

22 51. Answering Defendants deny each and every allegation or statement contained in
23 paragraph number 51 of the Complaint for Intervention.
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1 52. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 52 of the Complaint for Intervention.

3 53. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 53 of the Complaint for Intervention

5 54. Answering Defendants deny the allegations contained in paragraph number 54 for lack of
6 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

7 55. Answering Defendants deny each and every allegation or statement contained in
8 paragraph number 55 of the Complaint for Intervention.

9 56. Answering Defendants deny each and every allegation or statement contained in
10 paragraph number 56 of the Complaint for Intervention.

11 57. Answering Defendants deny each and every allegation or statement contained in
12 paragraph number 57 of the Complaint for Intervention.

13 58. Answering Defendants deny each and every allegation or statement contained in
14 paragraph number 58 of the Complaint for Intervention.

15 59. Answering Defendants deny each and every allegation or statement contained in
16 paragraph number 59 of the Complaint for Intervention.

17 60. Answering Defendants deny each and every allegation or statement contained in
18 paragraph number 60 of the Complaint for Intervention.

19 61. Answering Defendants deny each and every allegation or statement contained in
20 paragraph number 61 of the Complaint for Intervention.

21 62. Answering Defendants deny each and every allegation or statement contained in
22 paragraph number 62 of the Complaint for Intervention.

1 63. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 63 of the Complaint for Intervention.

3 64. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 64 of the Complaint for Intervention.

5 65. Answering Defendants deny each and every allegation or statement contained in
6 paragraph number 65 of the Complaint for Intervention.

7 66. Answering Defendants admit the quoted language is contained in Exhibit "9" to the
8 Complaint-Intervention. Except as expressly admitted, Answering Defendants deny each and every
9 allegations and statement contained in the paragraph 66.

10 67. Answering Defendants have insufficient information to form a belief as to the truth of
11 paragraph 67 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
12 allegations and each of them and requires strict proof thereof.

13 68. Answering Defendants deny each and every allegation or statement contained in
14 paragraph number 68 of the Complaint for Intervention.

15 69. Answering Defendants deny the allegation contained in paragraph 69 for lack of
16 information or knowledge.

17 70. Answering Defendants deny each and every allegation or statement contained in
18 paragraph number 70 of the Complaint for Intervention.

19 71. Answering Defendants deny each and every allegation or statement contained in
20 paragraph number 71 of the Complaint for Intervention.

21 72. Answering Defendants deny each and every allegation or statement contained in
22 paragraph number 72 of the Complaint for Intervention.

1 73. Answering Defendants have insufficient information to form a belief as to the truth of
2 paragraph 73 of Plaintiffs' Complaint and placing its denial on that ground, denies the allegations and
3 each of them and requires strict proof thereof.

4 74. Answering Defendants have insufficient information to form a belief as to the truth of
5 paragraph 74 of Plaintiffs' Complaint and placing its denial on that ground, denies the allegations and
6 each of them and requires strict proof thereof.

7 75. Answering Defendants have insufficient information to form a belief as to the truth of
8 paragraph 75 of Plaintiffs' Complaint and placing its denial on that ground, denies the allegations and
9 each of them and requires strict proof thereof.

10 76. Answering Defendants deny the allegations contained in paragraph number 76 for lack of
11 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

12 77. Answering Defendants deny the allegations contained in paragraph number 77 for lack of
13 information or knowledge sufficient to form a belief as to the truth of the matters asserted.

14 78. In answering the allegations in paragraph 78, Answering Defendants incorporate by
15 reference each and every admission and denial contained in paragraph 1-77 of Answering Defendant's
16 answer.

17 79. Answering Defendants deny each and every allegation or statement contained in
18 paragraph number 79 of the Complaint for Intervention.

19 80. In answering the allegations in paragraph 80, Answering Defendants incorporate by
20 reference each and every admission and denial contained in paragraph 1-79 of Answering Defendant's
21 answer.

22 81. Answering Defendants deny each and every allegation or statement contained in
23 paragraph number 81 of the Complaint for Intervention.

1 82. In answering the allegations in paragraph 82, Answering Defendants incorporate by
2 reference each and every admission and denial contained in paragraph 1-81 of Answering Defendant's
3 answer.

4 83. Answering Defendants deny each and every allegation or statement contained in
5 paragraph number 83 of the Complaint for Intervention.

6 84. In answering the allegations in paragraph 84, Answering Defendants incorporate by
7 reference each and every admission and denial contained in paragraph 1-83 of Answering Defendant's
8 answer.

9 85. Answering Defendants deny each and every allegation or statement contained in
10 paragraph number 85 of the Complaint for Intervention.

11 86. In answering the allegations in paragraph 86, Answering Defendants incorporate by
12 reference each and every admission and denial contained in paragraph 1-85 of Answering Defendant's
13 answer.

14 87. Answering Defendants deny each and every allegation or statement contained in
15 paragraph number 87 of the Complaint for Intervention.

16 88. Answering Defendants deny each and every allegation or statement contained in
17 paragraph number 88 of the Complaint for Intervention.

18 89. Answering Defendants have insufficient information to form a belief as to the truth of
19 paragraph 89 of Plaintiffs' Complaint for Intervention and placing its denial on that ground, denies the
20 allegations and each of them and requires strict proof thereof.

21 90. Answering Defendants deny each and every allegation or statement contained in
22 paragraph number 90 of the Complaint for Intervention.

1 91. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 91 of the Complaint for Intervention.

3 92. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 92 of the Complaint for Intervention.

5 93. Answering Defendants deny each and every allegation or statement contained in
6 paragraph number 93 of the Complaint for Intervention.

7 94. In answering the allegations in paragraph 94 Answering Defendants incorporate by
8 reference each and every admission and denial contained in paragraph 1-93 of Answering Defendant's
9 answer.
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11 95. Answering Defendants deny each and every allegation or statement contained in
12 paragraph number 95 of the Complaint for Intervention.

13 96. Answering Defendants deny each and every allegation or statement contained in
14 paragraph number 96 of the Complaint for Intervention.

15 97. Answering Defendants deny each and every allegation or statement contained in
16 paragraph number 97 of the Complaint for Intervention.

17 98. In answering the allegations in paragraph 98, Answering Defendants incorporate by
18 reference each and every admission and denial contained in paragraph 1-97 of Answering Defendant's
19 answer.
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21 99. Answering Defendants deny each and every allegation or statement contained in
22 paragraph number 99 of the Complaint for Intervention.

23 100. Answering Defendants deny each and every allegation or statement contained in
24 paragraph number 100 of the Complaint for Intervention.
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1 101. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 101 of the Complaint for Intervention.

3 102. In answering the allegations in paragraph 102, Answering Defendants incorporate by
4 reference each and every admission and denial contained in paragraph 1-101 of Answering Defendant's
5 answer.

6 103. Answering Defendants admit each and every allegation or statement contained in
7 paragraph number 103 of the Complaint for Intervention.

8 104. Answering Defendants deny each and every allegation or statement contained in
9 paragraph number 104 of the Complaint for Intervention.

10 105. Answering Defendants deny each and every allegation or statement contained in
11 paragraph number 105 of the Complaint for Intervention.

12 106. Answering Defendants deny each and every allegation or statement contained in
13 paragraph number 106 of the Complaint for Intervention.

14 107. Answering Defendants deny each and every allegation or statement contained in
15 paragraph number 107 of the Complaint for Intervention.

16 108. Answering Defendants deny each and every allegation or statement contained in
17 paragraph number 108 of the Complaint for Intervention.

18 109. Answering Defendants deny each and every allegation or statement contained in
19 paragraph number 109 of the Complaint for Intervention.

20 110. In answering the allegations in paragraph 110, Answering Defendants incorporate by
21 reference each and every admission and denial contained in paragraph 1-109 of Answering Defendant's
22 answer.
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1 111. Answering Defendants deny each and every allegation or statement contained in
2 paragraph number 111 of the Complaint for Intervention.

3 112. Answering Defendants deny each and every allegation or statement contained in
4 paragraph number 112 of the Complaint for Intervention.

5 113. Answering Defendants deny each and every allegation or statement contained in
6 paragraph number 113 of the Complaint for Intervention.

7 114. Answering Defendants deny each and every allegation or statement contained in
8 paragraph number 114 of the Complaint for Intervention.

9 115. Answering Defendants deny each and every allegation or statement contained in
10 paragraph number 115 of the Complaint for Intervention.

11 116. Answering Defendants deny each and every allegation or statement contained in
12 paragraph number 116 of the Complaint for Intervention.

13 117. Answering Defendants deny each and every allegation or statement contained in
14 paragraph number 117 of the Complaint for Intervention.

15 118. In answering the allegations in paragraph 118, Answering Defendants incorporate by
16 reference each and every admission and denial contained in paragraph 1-117 of Answering Defendant's
17 answer.
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19 119. Answering Defendants deny each and every allegation or statement contained in
20 paragraph number 119 of the Complaint for Intervention.

21 120. Answering Defendants deny each and every allegation or statement contained in
22 paragraph number 120 of the Complaint for Intervention.
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GENERAL DENIAL

Except for those facts expressly admitted, Answering Defendant generally denies all allegations in the Complaint in Intervention. Defendants further deny that Intervenor are entitled to the relief sought in the prayer contained in page 38-40 of the Complaint in Intervention or to any relief whatsoever.

AFFIRMATIVE DEFENSES

1. As a First Affirmative Defense, Intervenor fails to state a claim upon a relief can be granted.
2. As a Second Affirmative Defense, Intervenor's claims are barred by Waiver.
3. As a Third Affirmative Defense, Intervenor's claims are barred by Estoppel.
4. As a Fourth Affirmative Defense, Intervenor's claims are barred by Fraud.
5. As a Fifth Affirmative Defense, Intervenor's claims are barred by Statute of Limitations.
6. As a Sixth Affirmative Defense, Intervenor's are barred by Illegality.
7. As a Seventh Affirmative Defense, Intervenor's claims are barred by Laches.
8. As an Eight Affirmative Defense, Intervenor's claims are barred by Unclean Hands.
9. As a Ninth Affirmative Defense, Intervenor's claims are barred by Release.
10. As a Tenth Affirmative Defense, Intervenor's claims are barred by Status of frauds.
11. As an Eleventh Affirmative Defense, Intervenor's claims are limited because Intervenor have not suffered damage or because Intervenor's failure to mitigate damages.
12. As a Twelfth Affirmative Defense, Answering Defendants acted in good faith at all relevant times.
13. As a Thirteenth Affirmative Defense, Answering Defendants' had a legitimate business reason for terminating Intervenor's employment.

WHEREFORE, DEFENDANTS PRAY THAT:

1. Intervenor takes nothing by its complaint for Intervention;
2. Answering Defendant be awarded costs of this action and reasonable attorney's fees;
and
3. For such further relief as the Court deems just and proper.

Dated this 10th day of March, 2008.

/s/
STEVEN P. PIXLEY, ESQ.
Attorney at Law